



1251 Sixth Ave 21st Floor New York, NY 10020

Laura R. Handman

Tel. 212.489.8230 Fax 212.489.8340 laurahandman@dwt.com

November 24, 2020

Via ECF

The Honorable Edgardo Ramos Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: In re Ex Parte Application of Eurasian Natural Resources Corporation Limited Pursuant to 28 U.S.C. § 1782 for Leave to Take Discovery for Use in Foreign Proceedings, No. 1:20-mc-00312-ER (S.D.N.Y. 2020)

Dear Judge Ramos:

We represent Respondent HarperCollins Publishers LLC ("HarperCollins") in the above-referenced action. We write pursuant to Your Honor's Individual Practices to request oral argument on HarperCollins' Motion to Quash Subpoena, or in the Alternative, for a Protective Order, filed today.

Respectfully submitted,

/s/ Laura R. Handman